

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DANIEL YANNES, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SCWORX CORP. and MARC S.
SCHESSEL,

Defendants.

Case No. 1:20-CV-03349-JGK

CLASS ACTION

CAITLIN LEEBURN, Individually and
On Behalf of All Others Similarly
Situated,

Plaintiff,

v.

SCWORX CORP. and MARC S.
SCHESSEL,

Defendants.

Case No. 1:20-CV-04072-JGK

Captions continue on next page.

**NOTICE OF BHUPANDER VIRK'S MOTION FOR (1) CONSOLIDATION; (2)
APPOINTMENT AS LEAD PLAINTIFF; AND (3) APPROVAL OF LEAD COUNSEL**

JONATHON CHARLES LEONARD,
On Behalf of Himself and All Others
Similarly Situated,

Plaintiff,

v.

SCWORX CORP. and MARC S.
SCHESSEL,

Defendants.

Case No. 1:20-CV-04777-JMF

PLEASE TAKE NOTICE that on a date and time as may be set by the Court, Bhupander Virk (“Virk”) will respectfully move to this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”) for entry of an Order (1) consolidating the above-captioned actions; (2) appointing Virk as Lead Plaintiff; and (3) approving Virk’s selection of Faruqi & Faruqi, LLP as Lead Counsel for the Class.

This motion is based on the accompanying Memorandum of Law in support hereof, the Declaration of Richard W. Gonnello and exhibits filed herewith, the pleadings and other filings herein, and such other written and oral argument as may be permitted by the Court.

For the foregoing reasons, Virk respectfully requests that the Court (1) consolidate the above-captioned actions; (2) appoint Virk as Lead Plaintiff pursuant to the PSLRA; (3) approve Faruqi & Faruqi, LLP as Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: June 29, 2020

Respectfully submitted,

FARUQI & FARUQI, LLP

By: /s/ Richard W. Gonnello
Richard W. Gonnello

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Attorneys for [Proposed] Lead Plaintiff Bhupander Virk and [Proposed] Lead Counsel for the putative Class